



A response to the Government's Badger Culling Consultation March 2006

Introduction

The consultation on badger culling announced by DEFRA in December 2005 is to be welcomed if only because the Government now appears to accept it is futile to attempt to control bovine tuberculosis in cattle without bearing down on the reservoir of disease in badgers. That apart, the convoluted 50 page consultation document and the 30 page annex, the so called Partial Regulatory Impact Assessment, provide little or no evidence that was not available 25-30 years ago from the Thornbury, Steeple Leaze, East Offaly and Hartland Point badger culling trials. And more recently evidence from the Four Counties trial in Ireland has also shown that culling of badgers can have a major impact on the disease in cattle.

However, we are disappointed that the objective of the Government is only “a sustained reduction in the incidence of the disease in cattle in high incidence areas in England”. The objective should be complete eradication of the disease. And, contrary to that stated in the PRIA, bovine TB is not one of the most difficult animal health problems the farming industry faces in GB today; it was almost eradicated in the 1980s by a combination of cattle testing and badger culling. The badger, by virtue of its behaviour, is probably one of the easiest species of wildlife to control. The problem has only appeared to become difficult because, since the mid 1980s, successive Governments have failed to tackle the problem properly, especially since 1997 when, with the exception of the Randomised Badger Culling Trials, the present Government abandoned badger culling altogether.

Nor should the decision to implement badger culling be dictated primarily by a cost benefit analysis. The overwhelmingly important considerations of animal health and welfare including human health cannot be measured in terms of a cost benefit analysis.

Perhaps the one useful piece of information to emerge from the consultation documents and the Randomised Badger Culling Trials is the realisation that incomplete badger culling can actually exacerbate the problem by the so called perturbation or fringe effect whereby inefficient culling disturbs and disperses infected badgers over a wider area. This phenomenon must therefore be a major consideration in the design of any badger culling strategy.

Badger culling

We conclude therefore that in order to reverse the present alarming escalation of bovine TB, detailed in the consultation documents, a sustained and comprehensive cull of badgers is essential in areas with a high incidence of the disease in cattle. Cattle are highly susceptible to bovine TB and act as sentinels for the disease in badgers. Prevalence of infection in badgers in these endemic areas is conservatively estimated at 26% of which a proportion may suffer protracted fatal disease.

Bearing in mind the perturbation effect mentioned above, we believe that the programme has to be planned and coordinated by DEFRA over widely inclusive areas. Furthermore, where possible, natural boundaries such as rivers or man made ones such as canals or motorways should be used to delineate these areas, which should be kept completely free of badgers for at least a year.

Piecemeal culling by farmers should not be utilised although it may be relevant to note that since the Hunting Act (2004) night shooting (lamping) of foxes has led to the virtual eradication of foxes in some areas. Nevertheless we believe that the only effective method of culling will be wholesale destruction of badger social groups by day time gassing, probably using carbon monoxide and/or

carbon dioxide. And that DEFRA, as a matter of urgency, should carry out experiments to perfect this technique.

Further control

In addition to comprehensive and sustained culling in areas of high incidence of the disease in cattle we believe this control should be backed up by nationwide reduction of the badger population *per se*. Much of the problem associated with bovine TB in UK and Ireland is because the badger, a species without natural predators and protected by law since 1973, is now a classic example of a population out of control through lack of management. The population has probably increased 10-20 fold in the last decade and, apart from being a potential reservoir of a serious zoonotic disease, the animal has now become a major agricultural pest across the country, from a) the damage that it does by digging and, b) from its predation on ground nesting birds, hedgehogs, new born lambs and free range piglets. Furthermore it is probable that the substantial increase in numbers of badgers over the last decade will have contributed in part to the perturbation problem in high density areas.

The badger is not an endangered species and no longer merits its protected status. This should be removed and similar legislation, as for deer, including a close season, put in place whereby local landowners and farmers are allowed to control their local badger populations. Such measures would also relieve the badger population from the other adverse effects of overpopulation; namely, loss of territory, fighting, wounding, increased risk of road accidents, lack of food and starvation.

The actual method of control can be left to the landowner or farmer but probably the most humane and effective method is shooting using a silenced rifle at night. The badger, by virtue of its communal, crepuscular behaviour, presents an easy target and the procedure causes minimal disturbance when in the hands of experienced game keepers or similarly experienced countrymen. As mentioned above, the method has already been highly effective since the Hunting Act (2004) in eradicating foxes from certain areas of the country.

Vaccination

Vaccination against bovine TB, which is not compatible with eradication, should not be regarded as either a short or long term measure for control of bovine TB in cattle. Eradication by vaccination can only be achieved with a highly immunogenic vaccine, such as that for smallpox which confers solid lifelong immunity. Research to date has not revealed any promising candidate vaccines for bovine TB and biology and history do not encourage optimism. BCG, the only vaccine presently available is unpredictable in the level of protection that it affords in man and experimental animals.

Conclusions

1. A sustained and comprehensive culling of diseased communities of badgers is essential to bring TB in badgers and cattle under control. There is no other option.
2. The objective should be eradication of bovine tuberculosis not merely sustained reduction.
3. Culling in areas of endemic disease should be backed up by a nationwide control of the whole badger population.
4. Vaccination, which is incompatible with eradication, should not be regarded as a short or long term measure of control.
5. The emotive support for the badger is unbalanced and uninformed and should not continue to undermine proper veterinary concern for the health and welfare of badgers, cattle and other wild and domestic animal species.

L.H.Thomas
Secretary